



**THE CITY OF NEW YORK
LAW DEPARTMENT**

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July 29, 2025

The Honorable Louis L. Stanton
United States District Judge
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007

Re: *City of New York v. Magellan Technology, Inc., et al.*, No. 23-cv-5880 (S.D.N.Y.)

Dear Judge Stanton:

This office represents Plaintiff the City of New York (the “City”) in this action. I file this letter to request a pre-motion conference concerning a motion to compel discovery against Defendants Mahant Krupa 56, LLC d/b/a Empire Vape Distributors (“Empire”), Nikunj Patel, and Devang Koya (together, the “Empire Defendants”) pursuant to your Honor’s Individual Practices 2(A) and Local Civil Rule 37.2.

Discovery is due to conclude on July 30, 2025. *See* May 1, 2025 Order (*ECF No.* 145). The City has already produced documents to the Empire Defendants. However, the Empire Defendants have not produced *any* documents to date, despite multiple requests from the City.

Therefore, the City respectfully requests a discovery conference for leave to compel the Empire Defendants to produce discovery. Thank you for your attention to this matter.

Respectfully submitted,

/s/ Alexandra Jung
Alexandra Jung
Assistant Corporation Counsel